

Attachment 13

Ambient Air Monitoring Program

EQ Resource Recovery, Inc. (EQRR)

Romulus, MI

AMBIENT AIR MONITORING PROGRAM

MI ACT 451, Part 111

Rule 299.9611

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(EQRR Attachment # ?)

INTRODUCTION:

In accordance to the Michigan Department of Environmental Quality (MDEQ), Waste and Hazardous Materials Division (WHMD) Part 111, ambient air monitoring will be conducted as a requirement of the Hazardous Waste License. The ambient air monitoring plan is an attachment to the license and a stand alone document. The ambient air quality will be monitored at four stations around the perimeter of the site. These locations are noted on the attached Figure 1. The ambient air monitoring program described will be used to characterize the air quality associated with EQ Resource Recovery, Inc. (EQRR). All four sites are monitored for **Total Suspended Particulate (TSP) using a filter based high volume sampler, metals (lead and cadmium) are analyzed from the TSP filter**, and Volatile Organic Compounds (VOCs) using a sorbent tube sampler. Site 1 (82921) is a collocated site that has pairs of each sampling device. The sampling for all parameters will be conducted in accordance to the methods specified by the United States Environmental Protection Agency (USEPA) in Title 40 of the Code of Federal Regulations (CFR) Parts 50, 53, 58 and the Toxic Organic Compendium Method, TO-17 for solid sorbent tubes. The sampling will be conducted on the prescribed sample days as determined by the (USEPA).

SAMPLING

Metal concentrations will be determined from the samples collected in a reference method high volume TSP sampler. The sampling for multi-metals will adhere to the requirements of 40 CFR Part 50, Appendix G for the determination of lead. All sections referenced by Part 50, Appendix G will likewise be followed. The analysis will be performed using USEPA Reference Methods for lead and the other metals listed in the attached table to this monitoring plan. Quality control and assurance requirements specified in the method will be incorporated in the sampling protocol. Samples will be collected every 12 days for a twenty-four (24) hour period with a nominal flow rate of 50 cfm \pm 10 cfm.

VOC's will be sampled utilizing a system of sorbent tubes capable of effectively collecting the listed compounds in the attached table. A constant flow sampling pump is operated at approximately 0.10 liters per minute (lpm). Samples will be collected at a flow rate adequate to reach the required limits of detection. Sampling will be conducted in adherence to the USEPA's Toxic Organic Compendium Method, TO-17 for solid sorbent tubes. Starting January 1, 2006, sampling will be conducted on an every **12** day schedule until the WHMD has approved Part 111 hazardous waste operations to resume. After the above referenced approval is received, EQRR will resume sampling on a every 6 day schedule.

QUALITY ASSURANCE

On each run day, samples from the collocated site shall be analyzed and reported to the MDEQ, AQD for the assessment of sampler precision. One sample day per month, one blank sorbent tube and metals filter shall accompany the samples to the collocated site, not have air pulled through it, then submitted to the laboratory as a “trip blanks”. The **trip blanks will likewise be reported to the AQD with the data set.** All laboratory quality assurance, such as the analysis of **lab** blanks and standards, shall be made available to the MDEQ upon request for the determination of accuracy. If any parameter that is analyzed by the laboratory and determined to be non-detectable, the value of the method detection limit for that compound divided by 2 (MDL/2) shall be reported. Staff from the MDEQ’s AQD and WHMD may audit the ambient air monitoring program, files, and samplers at their discretion.

REPORTING

Within 60 days after the end of the month in which it was collected, all ambient air monitoring data will be reported in an acceptable electronic format to the MDEQ, AQD. The facility will keep copies of all ambient air data on-site for at least 3 years. A request can be made to the Chief of the WHMD to modify the monitoring plan if one year of sampling events show non-detectable levels of that parameter. The determination to alter the ambient air monitoring plan shall be made by staff from both the WHMD and the AQD. The final approval letter regarding any changes to the ambient air monitoring plan will be issued by the WHMD.

**EQRR – AMBIENT AIR - MONITORING PARAMETERS
(METALS and PARTICULATES)**

<u>COMPOUND</u>	<u>DETECTION LIMIT (ug/m³)</u>
CADMIUM	0.005
LEAD	0.5
TOTAL SUSPENDED PARTICULATES	1.0

**EQRR – AMBIENT AIR - MONITORING PARAMETERS
(ORGANIC COMPOUNDS)**

<u>COMPOUND</u>	<u>DETECTION LIMIT (ug/m³)</u>
BENZENE	0.04
CARBON TETRACHLORIDE	0.25
CHLOROFORM	0.05
ETHYLBENZENE	1.0
METHYLENE CHLORIDE	1.0
1,1,2,2-TETRACHLOROETHANE	0.1
TETRACHLOROETHENE	0.1
1,1,2 - TRICHLOROETHENE	0.1
TRICHLOROETHENE	0.1
TOLUENE	1.0
XYLENE (TOTAL)	1.0